

Before the
Federal Communications Commission
Washington, DC 20554

RECEIVED
SEP 29 1995

In the Matter of)
)
Amendment of Part 95 of the)
Commission's Rules to)
Establish a Very Short Distance)
Two-Way Voice Radio Service)

100-100-100

WT Docket 95-102

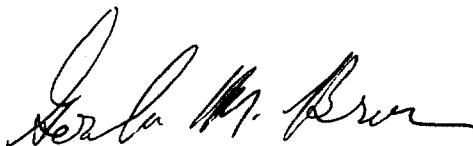
DOCKET FILE COPY ORIGINAL

COMMENTS TO A NOTICE OF PROPOSED RULE MAKING

Filed by:

Gordon M. Brown
125 Oval Road
Irvine CA 92714

GMRS Call Sign: South Coast 320 KAD3271
Amateur Radio Call Sign: N6JXE



September 25, 1995

No. of Copies rec'd
List ABCDE

0511

GORDON M. BROWN
125 OVAL ROAD, IRVINE, CALIFORNIA 92714
(714) 559-4729 FAX (714) 258-3014

Dear FCC Commissioners:

I have been active in citizen radio communications for over thirty years. I began using Citizen Band (CB) as a Search and Rescue Boy Scout Explorer in high school in 1967. After going to work for the Red Cross in 1982, I soon became licensed as an amateur radio operator. I subsequently joined a local REACT that was affiliated with the Red Cross. I have also operated on Red Cross low band and UHF frequencies and on Civil Air Patrol frequencies. Therefore, I have the opportunity to operate on a variety of radio systems in several spectrums both in emergency situations and on a day to day basis.

It is clear that there has been, exists, and will continue to be a growing need for two-way radio communication for citizens in business, during emergencies, and in conducting daily routines. Both the cost and the nature of being limited to two parties makes cellular telephone not appropriate for all the communication needs of today.

It is also equally clear to not expand radio services to the detriment of existing services for this does not truly expand radio services and may actually degrade the overall communication service delivery system. Let me give you my thoughts on the status of each of the currently available services.

CITIZEN'S BAND truly has become the universal accessible radio service to the everyday citizen. It is cheap and easy to use. But this has made it almost *too* accessible to the public. Being used by so many has made it impossible to regulate. And its low frequency ability to "skip" over long distances often makes it difficult to use without great interference. This may come from either unruly users or "Dxers" who cannot hear if there is a conversation going on when they turn on their powerful (albeit illegal) amplifiers. Still, it serves well for short distance communications such as car caravans and to check with truckers on road conditions ahead. And occasionally I actually do hear a call for help on Channel 9 and pass on the traffic on other systems to authorities.

FAMILY RADIO SERVICE (really a pseudonym for Citizen Band in that I doubt there will be any effort or way to limit it to *family* communications) can provide a needed dependable short range communications. With the elimination of "skip" problems inherent in the lower bands and using FM, clearer two way communication can occur. This is, however, somewhat met with the expanded 49 MHz spectrum. The question I will address under GMRS is whether any new spectrum should be superimposed over existing GMRS frequencies.

AMATEUR RADIO provides an excellent medium for a variety of dependable communication for families over long and short distances both in emergencies and daily routine. However, there is generally not a dependable monitoring system in place. I have often gone from repeater to repeater in non-active times to find someone monitoring to call in an accident or other emergency, only to find no one there. It has become easier to get a license with the no code requirement, but still only a few pursue getting the licenses.

GMRS is where many serious communicators have gone to complete their array of needed communication resources. It is far more dependable and longer in range than CB. But it also draws those together who wish to provide virtually 24 hours a day a link to emergency services.

Here in Southern California, REACT is very well organized with several teams active in daily monitoring as well as providing communications for community events. During high commute times in the morning and afternoon, "Traffic Watch" monitors log peoples' commutes to determine traffic flow. They call in emergencies immediately.

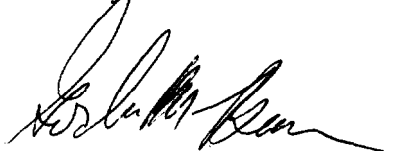
There are also "Traffic Tip Monitors." These are local radio and television stations who have code squelched radios. When a major traffic tie up is seen, a series of touch-tone signals turns on their monitor radio and they are informed of the problem and back-up. This is then broadcast to the general public within minutes over commercial radio stations so that these areas of congestion can be avoided and help with the overall traffic flow on our busy freeways.

With the massive marketing of FM "Family Radio Service" (FRS) simplex radios in this spectrum, this extensive GMRS network is threatened. Given the undisciplined radio practices seen on CB over the past forty years, there is little hope of this changing on a similar system on FRS. I can easily see large numbers of people chatting away on their commutes on the output frequencies of GMRS repeaters and creating interference with REACT members passing critical emergency or traffic updates on their repeaters. This can be easily remedied by licensing FRS in other available higher frequency "Part 15" band spectrums. And why doesn't the expanded allocated frequencies in the 49 MHz spectrum already meet this need? And can't some frequencies from the 900 Mhz spectrum be allocated to FRS?

GMRS now provides the open accessible radio systems for emergency traffic that CB Channel 9 was supposed to provide. To degrade this after so many successful years of operation seems unwise. And to expect that an unlicensed citizenry will operate any more disciplined in this spectrum than they did in 27 MHz is unrealistic.

Therefore I and the many dedicated emergency communicators urge you to consider another spectrum for this needed FRS spectrum; one that doesn't interfere with existing successful emergency systems.

Sincerely,



Gordon M. Brown
South Coast 320 KAD 3271
N6JXE